

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

UNILOC 2017 LLC

Plaintiff,

vs.

Case No. 2:19-cv-00102

AT&T SERVICES, INC., and  
AT&T MOBILITY LLC,

Jury Trial Demanded

Defendants.

---

**DECLARATION OF JACOBUS DU PLOOY IN SUPPORT OF  
ERICSSON INC.'S MOTION TO INTERVENE AS A DEFENDANT**

I, Jacobus du Plooy, declare the following:

1. I am currently a Vice President and Chief Technology Officer at the Global Customer Unit for AT&T at Ericsson Inc. ("Ericsson"). I make this declaration in support of Ericsson's Motion to Intervene as a Defendant. The following facts are true to the best of my knowledge and, if called upon to do so, I could and would competently testify to the truth thereof.

2. Ericsson has designed, manufactured, marketed and sold RNCs and base stations that can operate on WCDMA networks ("Ericsson WCDMA Products"). Ericsson has also designed, manufactured, marketed and sold base stations that can operate on LTE networks ("Ericsson LTE Base Stations").

3. In my role at Ericsson, I have become familiar with both the Ericsson WCDMA Products and Ericsson LTE Base Stations.

4. From 2004 to 2014, I was involved in the deployment of the Ericsson WCDMA Products in AT&T's U.S. network. From around 2004 to the present, Ericsson has supplied

Ericsson WCDMA Products to AT&T. At least some of these Ericsson WCDMA Products are still active in the AT&T network.

5. I have been involved in AT&T's procurement of Ericsson LTE Base Stations from Ericsson. From roughly 2011 to the present, Ericsson has supplied Ericsson LTE Base Stations to AT&T. At least some of these Ericsson LTE Base Stations are still active in the AT&T network.

I declare under penalty of perjury that the foregoing is true and correct.

7/29/2019

Date

  
\_\_\_\_\_

Jacobus du Plooy